



STATE OF UTAH
DEPARTMENT OF HEALTH

NORMAN H. BANGERTE, GOVERNOR

SUZANNE DANDY, M.D., M.P.H., EXECUTIVE DIRECTOR

August 5, 1985

Leon J. Munyan
Sunshine Mining Company
P. O. Box 250
Eureka, Utah 84628

Re: Trixie Tailings Ponds

Dear Mr. Munyan:

We have reviewed your July 10, 1985 letter and the JBR Consultants' July 1, 1985 letter regarding proposed tailings ponds #4 and #1 for the Trixie milling operations. From the information submitted it appears that neither pond would comply with the Utah Wastewater Disposal Regulations.

The pond #4 revised dike was constructed without approval from this office and does not comply with the Utah Wastewater Disposal Regulations. Section 1.2.2 of these regulations states that "No person shall make or construct any device for treatment or discharge of wastewater (including storm sewers), except to an existing sewer system, without first receiving a permit to do so from the Committee or its authorized representative". No such approval for the reconstructed dike has been issued by the Water Pollution Control Committee and the pond is not approved for wastewater disposal.

The following changes and additional information would need to be submitted for our review and approval of pond #4:

1. Revised cross section of the pond showing liner thickness, pond depth, maximum water level, and dike slopes of approximately 3 horizontal to 1 vertical.
2. A plan view of the pond showing the relatively impervious clay material of less than 0.1" per day or other approved lining to at least one foot above the maximum water level.
3. A copy of the laboratory analysis of the clay permeability.
4. Site map showing the location of diversion ditches to prevent surface runoff from entering the pond. Calculations for any remaining minor surface runoff must also be included in the design basis.
5. A plan view of the tailings line to pond #4 and details of the inlet to the pond.
6. Design information on daily volume of tailings and volume of water to be discharged to the tailings pond.
7. Size, location, design, and capacity of the emergency overflow.

KENNETH L. ALKEMA, DIRECTOR • DIVISION OF ENVIRONMENTAL HEALTH

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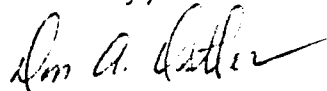
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Mr. Leon J. Munyan
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The JBR Consultants letter indicated permeabilities of 0.13 to 0.37 ft/day for pond #1. This seepage rate is too great to be accepted for disposal of wastewater containing chemicals not normally found in "waters of the State." Therefore the current proposal is not acceptable for disposal of these tailings. There also needs to be additional plans showing contours of this pond and lining etc. as requested on the other ponds.

Please contact Steven McNeal of this office if you have any questions regarding the information requested in this letter.

Sincerely,



Don A. Ostler, P.E., Chief
Engineering & Construction Grants
Bureau of Water Pollution Control

cc: JBR Consultants
Utah County Health Department
Oil, Gas & Mining

SRM:pa
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